

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

IN RE:

RUSSELL ROTHE

DEBTOR

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§  
§  
§  
§  
§

CASE NO. 23-60493  
CHAPTER 13

MOTION FOR PAYMENT OF ADMINISTRATIVE EXPENSES

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, WILLIAM H. LIVELY, JR., and files this Motion for Payment of Administrative Expenses, and for cause would show this Honorable Court as follows:

**Your rights may be affected by the relief sought in this pleading. You should read this pleading carefully and discuss it with your attorney, if you have one in this bankruptcy case. If you oppose the relief sought by this pleading, you must file a written objection, explaining the factual and/or legal basis for opposing the relief.**

**No hearing will be conducted on this Motion unless written objection is filed with the Clerk of the United States Bankruptcy Court and served upon the party filing this pleading WITHIN TWENTY ONE (21) DAYS FROM THE DATE OF SERVICE-shown in the certificate of service unless the Court shortens or extends the time for filing such objection. If no objection is timely served and filed, this pleading shall be deemed to be unopposed, and the Court may enter an order granting the relief sought. If an objection is filed and served in a timely manner, the Court will thereafter set a hearing with appropriate notice. If you fail to appear at the hearing, your objection may be stricken. The Court reserves the right to set a hearing on any manner.**

1. The Debtor's attorney hereby requests as an administrative expense the funds paid into the Debtor's Chapter 13 Plan to date up to \$2,385.00 for fees and expenses incurred with respect to the prosecution of this case, said fees and expenses being allowed pursuant to 11 U.S.C. Section 503(b) and 11 U.S.C. Section 1326(a)(2).
2. Specifically, said fees are being requested for services the Debtor's attorney has performed in this case, including the following: numerous consultations with client, preparation of Voluntary Petition, Creditor Matrix, Schedules and Statements, Chapter 13 Plan, filing of second Chapter 13 Plan, appearance at 341(a) Meeting of Creditors, preparation for 2 separate Confirmation Hearing(s), correspondence. Additionally, expenses incurred would include the following: postage, copy expense, long distance charges and PACER charges.

Respectfully submitted,

WILLIAM H. LIVELY, JR.  
WHL, PLLC  
432 S. Bonner Ave.  
Tyler, Texas 75702  
(903) 593-3001  
(903) 595-3715 FAX

/s/ William H. Lively, Jr.  
William H. Lively, Jr.  
State Bar Card No. 00786066

Attorney for Debtor

CERTIFICATE OF SERVICE

This is to hereby certify that a true and correct copy of the attached Application has been forwarded by United States' regular mail, postage prepaid, or by electronic means, to the parties on the attached mailing list on February 15, 2024.

/s/ William H. Lively, Jr.  
WILLIAM H. LIVELY, JR.

***SERVICE LIST OMITTED FROM  
MAIL OUT COPIES TO SAVE  
EXPENSE. COPY OF SERVICE  
LIST AVAILABLE UPON REQUEST***